Message

From: Bird, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8376934BF605424D8E870C10744090EC-BIRD, PATRICK]
Sent: 2/3/2022 7:43:56 PM
To: Wortman, Eric [Wortman.Eric@epa.gov]
Subject: FW: Sunrise Wind Modeling Question

See this question from Chris.

Ex. 5 Deliberative Process (DP) **Ex. 5 Deliberative Process (DP)**

Pat

From: Howard, Chris <Howard.Chris@epa.gov>
Sent: Thursday, February 3, 2022 1:41 PM
To: Biton, Leiran <biton.leiran@epa.gov>
Cc: Bird, Patrick <Bird.Patrick@epa.gov>; Gillam, Rick <Gillam.Rick@epa.gov>; Monteith, Richard <Monteith.Richard@epa.gov>; Friedman, Adam <Friedman.Adam@epa.gov>
Subject: Sunrise Wind Modeling Question

Leiran,

I hope you are doing well. I have a question for you regarding OCD modeling for Sunrise Wind. As I'm sure you know, Sunrise Wind proposes to use the OCD model for the purpose of comparing the impact of construction emissions to the Class I SILs. They propose to use a ring of receptors at a distance of 50 km from the project centroid. In the modeling protocol, they point out that some of these receptors will fall on Martha's Vineyard and Block Island (See Figure 4-4 below). They also point out that some of these receptors will have terrain elevations higher than the shortest stack height (20m). Some of the terrain on Martha's Vineyard is upwards of 90m. Sunrise wind also points out that Appendix W says that OCD is applicable for overwater sources where onshore receptors are below the lowest source height. Where onshore receptors are above the lowest source height, offshore plume transport and dispersion may be modeled on a case-by-case basis in consultation with the appropriate reviewing authority (paragraph 3.0(b)). Nevertheless, Sunrise Wind does advocate the use of OCD in this case and they request our concurrence for doing so.

We wanted to check with you to see if this has been an issue with past wind farm modeling efforts in Region 1. It seems that both Vineyard Wind and South Fork Wind had similar source/receptor relationships in the application of OCD. We do not see this as being an issue in this situation because the use of OCD as described in this case is a screening approach (4.2(c)(i) App W). Also, the transport distances from Sunrise Wind to the nearest land areas is at least 30km.

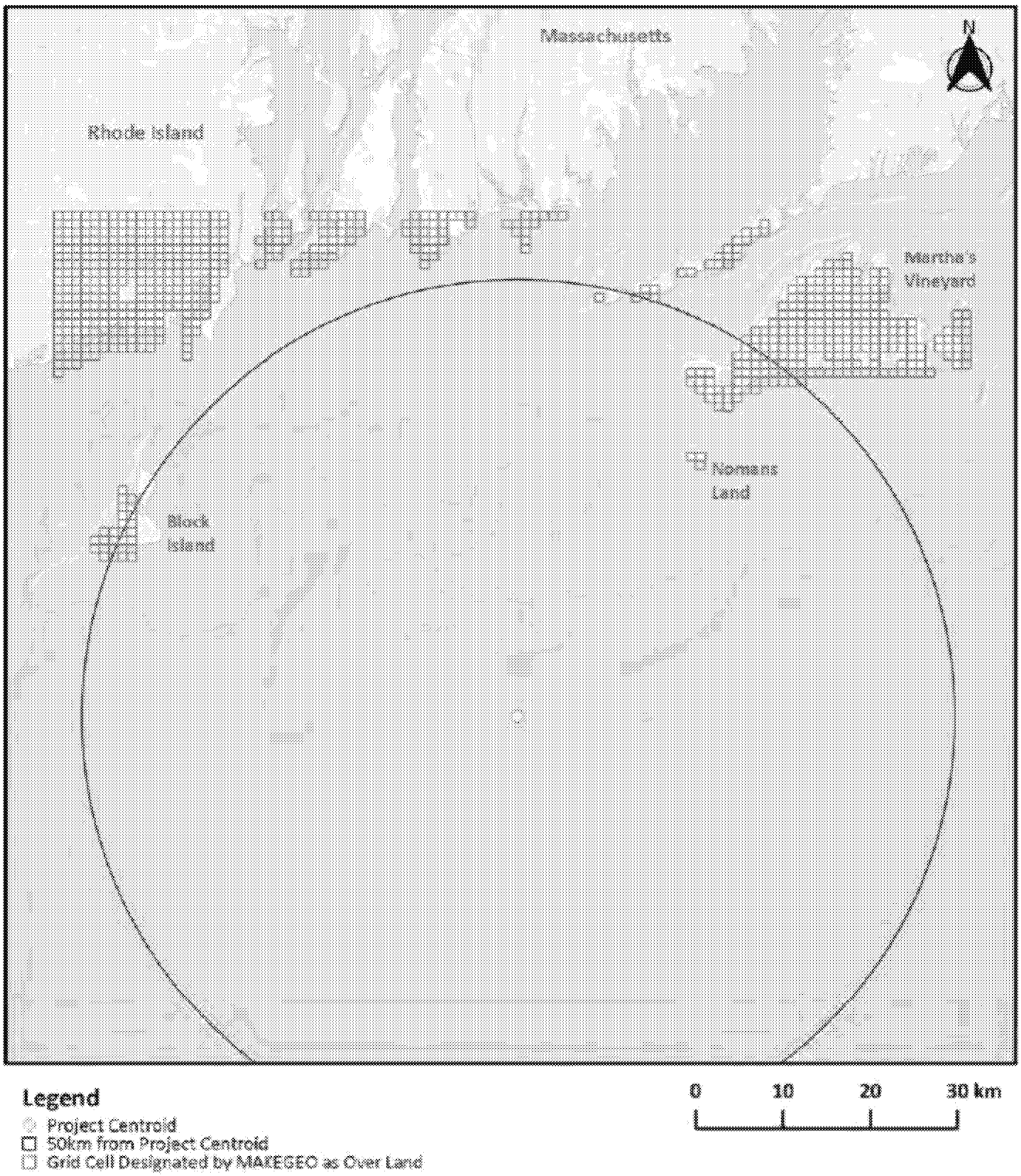
So we are inclined to concur with the use of OCD in this case. However, we greatly value your input. We also intend to consult with George Bridgers regarding this issue.

Sorry for the long and complicated email but we wanted to get your insight on this issue. If you wish to discuss, let us know and we can set up a Teams meeting. Alternatively, you can send us a Teams invite for a time that is good for you.

Thanks!

-Chris and the Region 4 Modeling Team

Figure 4-4
Digitized Grid of Land-Sea Interface Prepared by MAKEGEO Program



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